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UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA / LOS ANGELES DIVISION

In re)	Case No. 2:17-bk-23651-NB
)	
LETITIA LOUISE WELLINGTON,)	Chapter 7
)	
Debtor.)	STIPULATION TO CONTINUE MOTION
)	TO CONSOLIDATE LEAD CASE WITH
)	NONDEBTOR SPOUSE AMOS Q.
)	WELLINGTON
)	
)	Date: July 17, 2018
)	Time: 10:00 a.m.
)	Courtroom: 1575
)	
)	
)	

**TO THE HONORABLE NEIL W. BASON, UNITED STATES BANKRUPTCY
JUDGE; WESLEY H. AVERY, CHAPTER 7 TRUSTEE; HIS COUNSEL OF RECORD;
UNITED STATES TRUSTEE; AND ANY AND ALL INTERESTED PARTIES:**

This Stipulation ("Stipulation") is entered into by and between Sanaz Sarah Bereliani,
Attorney for Debtor Letitia Louise Wellington ("Debtor") on the one hand, and Stella Havkin,
Attorney for Creditor Michael D. Madison ("Creditor") on the other (together, the "Parties").

This Stipulation is entered into based on the following facts:

BACKGROUND INFORMATION

1. On or about May 15, 2018, the Creditor filed a Motion to Consolidate the Lead Case (“Motion”) with non-debtor Spouse Amos Q. Wellington as Docket 43. This Motion was set for hearing on June 12, 2018 at 11:00AM before the Honorable Judge Bason.
2. On or about May 15, 2018, the Debtor caused to be filed, Amendments to Schedules A/B, C, H, I, and the Statement of Financial Affairs as Docket 47.
3. On or about May 29, 2018, the Debtor filed an Opposition to the Motion as docket 56.
4. Lastly, on or about June 4, 2018, the Creditor Replied to the Opposition to the Motion.
5. There was one previous stipulation filed and entered in this case to allow time for the parties to enter into a compromise for the sale of Debtor’s residence.
6. Since then, the Debtor and Mr. Wellington have moved out of their residence and the Trustee has started listing the property and is now in the process of staging the home.
7. The parties at this time request a continuance of this motion for 120 days to allow further time for the sale of the Debtor’s residence, which will hopefully result in the resolution of this Motion.

THE STIPULATION

WHEREFORE, the Debtor and Creditor agree as to the following:

1. That the Motion be continued to a date in or about March 2019 to allow time for the Trustee to stage, list and sell the Debtor’s residence.


2. The Debtor does not agree to subordinate her right to the homestead exemption at this
time.

BERELIANI LAW FIRM, PC

Dated: October 13, 2018

By: /s/ Sanaz Sarah Bereliani
Sanaz Sara Bereliani, Attorney for Debtor
Letitia Louise Wellington

Dated: October 13, 2018


By: Stella Havkin
Stella Havkin, Attorney for Creditor
Michael D. Madison